

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

JAMES HUNT,)
)
Plaintiff,)
)
v.) Cause no. 3:15-cv-00433-MJR-SCW
)
MOORE BROTHERS, INC., WEST)
RIVER DISTRIBUTION, INC., SIDCO)
INVESTMENTS, MIDWEST)
OPERATIONS,)
)
Defendants.)

**MOTION FOR STAY PENDING APPEAL
AND APPROVAL OF CASH BOND**

Pursuant to Federal Rule of Civil Procedure 62(d), Appellant Jana Yocom Rine, files this Motion for Stay Pending Appeal and Approval of Cash Bond as follows:

1. On April 6, 2016 this Court ordered Attorney for Plaintiff to pay sanctions in the amount of \$7427. Payment is due on June 5, 2016.
2. On May 5, 2016 Attorney for Plaintiff filed a Notice of Appeal.
3. The automatic stay ends on May 19, 2016.
4. Attorney for Plaintiff requests a stay of enforcement of the order pending appeal and proffers a cash bond in the full amount of the sanction.
5. Rule 62(d) states:

(d) Stay with Bond on Appeal. If an appeal is taken, the appellant may obtain a stay by supersedeas bond, except in an action described in Rule 62(a)(1) or (2). The bond may be given upon or after filing the notice of appeal or after obtaining the order allowing the appeal. The stay takes effect when the court approves the bond.

Fed. R. Civ. P. 62(d).

6. Attorney for Plaintiff requests Court approve the proposed bond.

Wherefore, Plaintiff respectfully requests that this Court approve a cash bond in the full amount of the ordered sanction pending appeal of the order and that the Court grant her motion for stay of enforcement of the sanction order pending appeal.

Dated: May 18, 2016.

Respectfully submitted,

Jana Yocom, P.C.

/s/ Jana Yocom Rine

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Attorney for James Hunt

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing document was served on all counsel of record via CM/ECF on the date referenced above.

/s/ Jana Yocom

Jana Yocom Rine